



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Mr. Cristopher Anderson
Director, Environmental Affairs
L.E. Carpenter & Company
200 Public Square
Suite 36-5000
Cleveland, OH 44114-2304

JAN 20 1998

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) and the U.S. Environmental Protection Agency (EPA) have reviewed the Second Quarter Progress Report dated August 1996. This document provided information regarding historical site information regarding the lead levels (Inorganic Hot Spots B and C) as well as information about Hot Spots 1 and 4 and the MW-19 area. Comments are presented below:

1. Inorganic Hot Spots B and C - The document states that the levels of lead in the soil that exist on site are a result of historical mining activities, and not attributable to L.E. Carpenter activities. While the Department and EPA believe that these lead levels in the soil may be at background concentrations that exist in this area, more information is needed. Therefore, it is requested that L.E. Carpenter obtain twenty samples from off-site locations and analyze them for lead in order that those results can be compared to the levels found on the L.E. Carpenter property. Twenty samples are required so that the results can be considered statistically significant.

Alternatively, L.E. Carpenter can develop a revised risk assessment to determine the risk associated with leaving the lead contaminated soils on site as well as a focused feasibility study that would address the soil capping alternative for the lead contaminated soils. In this case, the lead contaminated soils would only be allowed to be left on site if the risk posed is within the acceptable range of 10^{-4} to 10^{-6} and all soils over 600 ppm would be capped with a soil cover.

2. Hot Spot 1 - The argument that DEHP in soils at Hot Spot 1 is due to ground water smearing is very weak. DEHP is not fully delineated in this area, therefore, it is requested that additional well points be installed at B-1, B-3, and B-4 and analyzed for DEHP.
3. Hot Spot 4 - The recommendation for additional limited excavation is acceptable, however post-excavation samples are required on the southeast

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side of the excavation unless the planned excavation is continued to points 4-DEL-3 and 4-DEL-7.

4. MW-19 Area - The proposed delineation plan for MW-19 area is acceptable.

Please feel free to contact me at (609) 633-7261 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gwen Barunas", with a long horizontal flourish extending to the right.

Gwen Barunas, P.E.
Case Manager
Bureau of Federal Case Management

c: Stephen Cipot, USEPA
John Prendergast, BEERA
George Blyskun, BGWPA